

K R A S K I N , L E S S E & C O S S O N , L L C
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

RECEIVED

April 15, 2003

APR 15 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: **VALLEY TELECOMMUNICATIONS COMPANY, INC.**
Request for Dismissal Without Prejudice of Petition for Waiver of
Section 20.18 of the Commission's Rules and the June 30, 2002 Deadline
for Compliance with 911 Text Telephone ("TTY") Obligations for Digital
Wireless Carriers, and


Final TTY Status Report - CC Docket No. 94-102

Attention: Mindy Littel - Policy Division, Wireless Telecommunications Bureau
Patrick Forster - Policy Division, Wireless Telecommunications Bureau

Dear Ms. Dortch:

On June 27, 2002, Valley Telecommunications Company, Inc. ("Valley") filed a request for waiver of Section 20.18 of the Commission's rules and the June 30, 2002 deadline for compliance with the 911 Text Telephone ("TTY") obligations for digital wireless carriers ("Petition"). The Petition remains pending before the Commission. Valley is now in compliance with Section 20.18 and the TTY obligations for digital wireless carriers. Accordingly, Valley respectfully requests that the Commission dismiss its Petition without prejudice. A "Final TTY Status Report" is attached hereto for filing and demonstrates that Valley is now in compliance with the Commission's TTY rules.

Please contact the undersigned with any questions or concerns.

By: 
John Kuykendall
Terri Granison
Its Attorneys

cc: Blaise Scinto, Chief - Policy Division Wireless Telecommunications Bureau
Pam Gregory - Consumer & Governmental Affairs Bureau

Attachment

No. of Copies rec'd 044
Date 4/15/03



Valley Telecommunications Company, **Inc.**

FINAL TTY STATUS REPORT

April 15, 2003

1. Network infrastructure software development

Valley Telecommunications Company, Inc. ("Valley") utilizes one Nortel Networks DMS100 switch to provide TDMA digital wireless services in certain areas throughout its market. Nortel Networks has completed its development of software and product tests.

2. Handset development and testing plans

Valley must rely on handset vendors to develop the required handsets. When handsets are available, testing can be performed with area **PSAPs** to insure compatibility.

3. Beta testing and lab testing

Valley must rely on Nortel Networks and handset vendors for initial conformance testing.

4. Release and general availability to carriers of network infrastructure software

The required software load, MTXIO, has been installed, and the TTY feature has been enabled. The switch is in compliance.

5. Availability to carriers to full acceptance test units

Valley understands that Nortel Networks has completed testing of its TTY solution. (See TDMA TTY/TDD Regulatory FAQ/RFI dated July 1, 2002, submitted in the July 12, 2002 TTY Forum Report pp. 73-75 ("Nortel RFI"))

6. Efforts toward achieving digital wireless solution capability with enhanced TTY devices

The solution provided by the **MTX10** software load addresses the Baudot type messages only. Valley understands that Nortel plans **to** support new and evolved standards in subsequent software releases. (See Nortel RFI)

7. Carrier coordination of testing with PSAP

See response to item 2 above.

8. Carrier testing activities, including field testing, consumer end-to-end testing, and other necessary tests

Valley will acquire compatible handsets when available, and test the service. Nortel Networks has performed preliminary testing within a lead customers line network. (See Nortel RFI)

9. Retail availability of necessary consumer equipment.

It is **unknown** when handsets will be available. Valley understands that the MTX10 software is the only requirement for implementation. The company has not been informed of any required hardware changes.

10. Geographic scope of network infrastructure deployment.

Arizona **RSA 6** which covers Cochise, Graham and Greenlee Counties.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Virgil Barnard", written in a cursive style.

Virgil Barnard

Contract & Compliance Manager